

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

Criminal No: 2:24-cr-764

v.

18 U.S.C. § 371

IBRAHIM FATHY SHEDID
AHMED FATHY SHEDID

18 U.S.C. § 2320

18 U.S.C. § 2323

18 U.S.C. § 2461(c)

INFORMATION

COUNT 1
(Conspiracy to Traffic in Counterfeit Goods)

THE UNITED STATES ATTORNEY CHARGES:

1. Beginning on a date unknown to the United States Attorney but at least as early as June 2023 and continuing thereafter, until at least February 2024, the exact dates being unknown to the United States Attorney, in the District of South Carolina, and elsewhere, the Defendants **IBRAHIM FATHY SHEDID** and **AHMED FATHY SHEDID**, together with others known and unknown to the United States Attorney, did knowingly and willfully conspire, agree, and have a tacit understanding to traffic and attempt to traffic counterfeit goods, in violation of Title 18, United States Code, Section 2320(a)(1).

MANNER AND MEANS OF THE CONSPIRACY

2. At all times relevant to this Information, **IBRAHIM FATHY SHEDID** and **AHMED FATHY SHEDID**, as part of the conspiracy, and with others known and unknown to the United States Attorney, did own and/or operate A2Z Warehouse and Big Boss Puff and Stuff.

3. A2Z Warehouse sold and/or distributed various merchandise to local convenience stores and other retail operations, to include Big Boss Puff and Stuff.

4. Local convenience stores and other retail operations, to include Big Boss Puff and Stuff, would then sell the merchandise purchased from A2Z Warehouse to their customers.

5. The merchandise sold and/or distributed by A2Z Warehouse and Big Boss Puff and Stuff included, but was not limited to, counterfeit drugs; to wit, Viagra.

6. **IBRAHIM FATHY SHEDID** and **AHMED FATHY SHEDID** did purchase the counterfeit Viagra, knowing that it was counterfeit, for the purpose of selling the goods and merchandise.

OVERT ACTS

7. In furtherance of the conspiracy and to accomplish the object of the conspiracy, Defendants **IBRAHIM FATHY SHEDID** and **AHMED FATHY SHEDID**, with others known and unknown to the United States Attorney, committed overt acts within the District of South Carolina, and elsewhere, including but not limited to the following:

- a. On or about June 2023, **IBRAHIM FATHY SHEDID** and **AHMED FATHY SHEDID**, and others known and unknown to the United States Attorney, sold counterfeit Viagra to a convenience store known to the United States Attorney for \$50 per bottle.
- b. On or about January 25, 2024, a shipment of counterfeit Viagra was delivered to Big Boss Puff and Stuff and accepted by an employee of Big Boss Puff and Stuff who was communicating with Defendant **IBRAHIM FATHY SHEDID** at the time of the delivery.

c. On or about January 26, 2024, Defendant **AHMED FATHY SHEDID**, and others known and unknown to the United States Attorney, did move box(es) of counterfeit Viagra from A2Z Warehouse to a storage unit rented by Defendant **IBRAHIM FATHY SHEDID**.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE**CONSPIRACY:**

Upon conviction for violations of Title 18, United States Code, Section 371 (Conspiracy to violate Title 18, United States Code, Section 2320), as charged in this Indictment, the Defendants, **IBRAHIM FATHY SHEDID** and **AHMED FATHY SHEDID**, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offenses, and any property, real or personal, constituting, derived from or traceable to proceeds the Defendants obtained, directly or indirectly, as a result of such offenses.

PROPERTY:

The property subject to forfeiture pursuant to Title 18, United States Code, Section 2323 and Title 28, United States Code, Section 2461(c), includes, but is not limited to, the following:

Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to their violations of Title 18.

Property Involved in the Counterfeit Trafficking:

Attachment A

SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b)(1) to seek forfeiture of any other property of the Defendants up to an amount equivalent to the value of the above-described forfeitable property.

All pursuant to Title 18, United States Code, Section 2323 and Title 28, United States Code, Section 2461(c).

ADAIR F. BOROUGH
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ATTACHMENT A

- 1) FPF 2024160100002301: (Search Warrant of Big Boss Puff Stuff)
 - a. 001- US Currency (\$1,526.00)
 - b. 002- Misc Documents
 - c. 003- Scale
 - d. 004- Man King- 40,000 each
 - e. 005- Royal Honey- Black (Sachets)- 39 each
 - f. 006- Royal Honey- Gold (Sachets)- 9 each
 - g. 007- Royal Honey- Gold (Pouches)- 9 each
 - h. 008- Viagra- 720 each (24 bottles)
 - i. 009- V12- 6 each
 - j. 010- Dell laptop with charger
 - k. 011- Black iPhone S/N: FFXKQS45N72J
 - l. 012- Gray iPhone S/N: G6TZQAGVN70G
- 2) FPF 2024160100002201: (Seizure of 19 UPS Boxes)
 - a. Counterfeit Viagra- 282,030 pills (9401 Bottles)
- 3) FPF 2024160100002601: (Seizure of 1 UPS Box)
 - a. Counterfeit Viagra- 15120 pills (504 Bottles)
- 4) FPF 2024160100005201: (1 Ibrahim Shedid cellphone)
- 5) FPF 2024160100003801: (Search Warrant of Storage Unit)
 - a. Counterfeit Viagra- 8190 pills (273 bottles)
 - b. V12- 3,864 each
 - c. Black Ant King- 20, 620 each
 - d. Tiger King (pills)- 7,510 each
 - e. Tiger King (cream)- 585 each
 - f. Man King- 40 each
 - g. Miscellaneous bag of pills- 1.4kgs
- 6) FPF 2024160100003901- (Search Warrant at A2Z Warehouse)
 - a. 002- LG cell phone S/N: LGE LM-Q730
 - b. 003- Dell Inspiron 3670 Desktop S/N: EA84A66B
 - c. 004- Portable storage devices
 - i. Sandisk (S/N: 24B8E174)
 - ii. Blue SD (S/N: BE820E13)
 - iii. PNY (S/N: SE31EEF9)
 - d. 005- Miscellaneous Documents

Attachment A

- e. Counterfeit Sports Clothing
 - i. NFL Headgear- 17 each
 - ii. NBA Headgear- 39 each
 - iii. NFL Socks- 711 pair

- f. Seized products set forth in chart:

Product Seized	Rep Sample	Bulk	Total
Royal Honey VIP	12	22608	22620
Rhino 500K African	12	936	948
Rhino 69	12	1572	1584
Magnumm XXL 24K Gold	24	3840	3864
Black Bull Extreme	15	10305	10320
Killer Bee	24	1128	1152
Pink PussyCat (gummy)	24	480	504
Rhino 69 (gummy)	24	216	240
Honey 14K	12	84	96
Rhino Platinum 800K	1	492	493
Pink PussyCat Passionfruit	60	37440	37500
New White Samurai X	24	4512	4536
Red Bull Honey	15	5580	5595
Goold Lion Chocolate	24	6240	6264
Fantasy Aphrodisiac Chocolate- Black	24	13128	13152
Pink PussyCat Chocolate	24	6432	6456
MV9 Platinum	24	3240	3264
Leopard Miracle of Honey	12	1440	1452

Attachment A

Fuel for Passion	12	144	156
Poseidon	12	264	276
Poseidon	12	144	156
Magnum XXL 24K	24	1680	1704
Red Devil	24	1704	1728
Max Fuel	12	900	912
Fantasy Aphrodisiac Chocolate-Purple	24	984	1008
Honey 9000K	12	1164	1176
Pink Pussycat/Gold Lion Combo	48	3024	3072
Kitty Kat	15	915	930
Bangkok	24	4248	4272
Pink Kitty	24	3216	3240
King Lion	24	6180	6204
Blue Bull Honey	15	3585	3600
Blue 6K	24	1560	1584
Royal Honey VIP liquid	12	1080	1092
MV7 Extreme	24	4056	4080
Rhino R7000	24	1416	1440
Magnum XXL 500K	24	1632	1656
Etumax Royal Honey	12	84	96
24K	12	3312	3324
Climax- Blue	24	1800	1824
Magnum XXL 98000	24	3336	3360
Magnum XXL 100K	24	408	432
Gold Lion (gummy)	24	216	240
Love	24	2136	2160
Rhino Platinum 25K	12	300	312
Rhino 7 Platinum 400K	12	120	132
Pink PussyPop	12	252	264

Attachment A

Gold Lion (gummy)	24	1584	1608
SWAG	24	3264	3288
Stiff Roxxx	12	324	336
Stiff Roxxx Gold	12	276	288
10K	12	888	900
Stiff Rox	24	984	1008
Hard Steel	12	10176	10188
Rhino 69 Honey	15	210	225
Climax- Pink	24	1416	1440
Libigrow	24	1200	1224
MV9 Gold	24	1920	1944
MV7 Platinum	24	2208	2232
MV7 Black	24	1872	1896
Kangaroo	24	576	600
Seductive Kiss	24	3528	3552
Xcaliber	24	1584	1608
Zues Plus	24	2088	2112
Niagra	24	4344	4368
Pink PussyCat	12	120	132
Liquid Titanium	12	96	108
Rhino 69 Platinum 100K	12	180	192
Rhino 69 Platinum 250K	12	432	444
Immoral 69	24	1008	1032
Hard Steel Honey	5	895	900
Blue Bull	12	708	720
Red Bull	12	180	192
Honeygizer	24	120	144
Samurai X Honey 6800	20	1060	1080
Leopard Miracle of Honey	12	708	720
14K Gold	12	1044	1056
SWAG Honey	12	2724	2736
Rollies Premium Honey	12	2700	2712

Attachment A

Wicked Hard	12	2136	2148
Sativa stud Honey	12	240	252
Queen Bee Bumbleberries	24	696	720
Stiff Rox Honey	12	840	852
Epimedyumlu Macun	2	31	33
Stiff Rox	12	276	288
Liquid Gold Very Berry	12	324	336
Royal Honey	12	11316	11328
WAP Watermelon Honey	24	12192	12216
Rhino 69 100K	12	96	108
Helms Honey	0	96	96
Get Rhino 500K Platinum	0	9	9
Royal Honey	0	17	17